

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:) Chapter 11
) Judge Charles M. Walker
AMARILLO PLATINUM, LLC;)
MIDLAND PLATINUM, LLC;) Case No. 3:24-bk-02447
MIDLAND PLATINUM II, LLC) Case No. 3:24-bk-02448
) Case No. 3:24-bk-02449
Debtors.)
) JOINT ADMIN REQUESTED

**THE DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING
ON MATTERS SET FOR JULY 9, 2024**

The above-captioned debtors (the “Debtors”) in the above-captioned bankruptcy cases hereby file the *Witness and Exhibit List* for the matters scheduled for hearing in this case on July 9, 2024.

WITNESSES

The Debtors designate the following individuals who may be called as witnesses:

1. Manoj (“Mike”) Patel, Owner and Director of Operations of National Hospitality Consulting Group (“NHCG”).
2. Any witness listed by any other party.
3. Any witness necessary to rebut the testimony of a witness called or designated by any other party.

EXHIBITS

1. *Consolidated Company Profile* [Docket No. 4].¹
2. *Expedited Motion for Entry of Order Directing Joint Administration of the Debtors’ Chapter 11 Cases.* [Docket No. 5].

¹ Unless otherwise specifically indicated, every citation to a docket entry shall reflect the docket of *In re Amarillo Platinum, LLC*, Case No. 3:24-bk-02447. The cited documents are identical in each of the three Debtors’ dockets.

3. *Expedited Motion for Entry of Order Authorizing Interim Use of Cash Collateral and Granting Final Use of Cash Collateral Absent Timely Objection.* [Docket No. 6].

4. *Expedited Motion for Authorization to Pay Pre-Petition Wages and Benefits.* [Docket No. 10].

5. *Certificate of Service* [Docket No. 15].

6. *Certificate of Service* [Docket No. 16].

7. Liens on property of Amarillo Platinum, LLC.

8. Liens on property of Midland Platinum, LLC.

9. Liens on property of Midland Platinum II, LLC.

10. Any exhibit listed by any other party.

RESERVATION OF RIGHTS

The Debtors reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and reserve the right to call additional witnesses and introduce additional exhibits in rebuttal. The Debtors further reserve the right to supplement this list prior to hearing.

Respectfully Submitted,

/s/ Henry E. ("Ned") Hildebrand, IV
Henry E. ("Ned") Hildebrand, IV
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed and served via the Court's CM/ECF filing and noticing system on July 8, 2024 to all parties registered to receive electronic notices in these cases.

/s/ Henry E. ("Ned") Hildebrand, IV
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